



February 17, 2017

Ashley Peters
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114.

Re: Comments on Grasslands Drainage Area Draft Groundwater Quality Management Plan

Dear Ms. Peters,

Thank you for the opportunity to comment on the Groundwater Quality Management Plan (GQMP) for the Grassland Drainage Area. Our organizations are reviewing all of the GQMPS developed for the Central Valley Board's Irrigated Lands Regulatory Program to ensure that they fulfill the intent of the Order, which identifies the GQMP as "the key mechanism under this Order to help ensure that waste discharges from irrigated lands are meeting Groundwater Receiving Water Limitation III.B." These plans therefore should provide specific strategies, actions and timetables to describe how and when water quality objectives will be achieved.

Unfortunately, this plan fails to meet the requirements of the Order. While we do appreciate that the plan makes a commitment to identify and properly destroy abandoned wells and to implement wellhead protection practices, for the most part the plan simply reiterates the basic requirements of the Order. That is insufficient to address water quality issues in high vulnerability areas, where communities and households are by definitions already impacted by degradation of groundwater quality.

The plan does provide some promising information, but fails to use that information to identify areas of further study or action. For instance;

- The plan makes a case that high naturally occurring nitrate levels may contribute to the nitrate levels in the GDA. But the plan fails to identify a program to investigate that case;
- The plan describes 3 different types of high vulnerability areas – hydrogeologic high vulnerability areas, high well vulnerability areas, and high tile drain vulnerability areas – yet describes no unique strategies for addressing the different areas
- Likewise, the plan prioritizes the [combined] high vulnerability areas, but then does nothing to either identify why differences exist, or focused strategies to address the highest priority areas;
- The plan identifies a significant change in irrigations pattern for the region since 2000, from largely gravity techniques to largely micro-irrigation, but fails to link that to



potential changes in nutrient load. Indeed, the description of the nitrate concentrations in the shallow groundwater area seems to indicate that nutrient loading has not diminished. This plan should identify this as an area of further investigation.

Additionally, this plan fails to identify additional steps to measure or reduce the rate of nitrogen loading to groundwater, beyond those already required by the Order, even though this is an area impacted by nitrate contamination and despite the fact that the Order clearly requires a higher standard for these plans. The coalition should consider additional proactive actions to meet water quality objectives, such as;

- Using the information provided by the upcoming Nutrient Summary Reports to identify areas with higher potential loading to groundwater for targeted additional outreach and education to reduce local nitrogen loading.
- Establishing a pilot groundwater recharge program in the vicinity of domestic wells that exceed drinking water standards to determine the impact of targeted recharge on water quality;
- Establishing performance measures for ensuring that best practices for nutrient and irrigation management identified through the Management Practices Effectiveness Program are implemented on 100% of irrigated acreage in high priority areas within a time certain, ideally 3-4 years.

Thank you for providing us the opportunity to comment on these documents. We look forward to working with your staff and the coalition on the further development and implementation of this plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "PSS", enclosed within a blue oval.

Phoebe Seaton
Co-Executive Director
Leadership Counsel for Justice and Accountability

A handwritten signature in black ink, appearing to read "Debi Ores".

Debi Ores
Attorney & Legislative Advocate
Community Water Center

A handwritten signature in black ink, appearing to read "Jennifer Clary".

Jennifer Clary
Water Policy Analyst
Clean Water Action